

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

COSMOKEY SOLUTIONS GMBH & CO. KG,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 18-1477-JLH-CJB
)	
DUO SECURITY, INC. n/k/a DUO SECURITY)	JURY TRIAL DEMANDED
LLC and CISCO SYSTEMS, INC.,)	
)	
Defendants.)	

**STIPULATION AND [PROPOSED] ORDER REGARDING
REVISED SCHEDULING ORDER DATES**

WHEREAS, the current close of fact discovery is June 28, 2024;

WHEREAS, pursuant to the Court's July 2, 2024 Oral Order (D.I. 231), the parties have further conferred and have agreed that good cause exists for the following modifications to the case schedule pursuant to Federal Rule of Civil Procedure 16(b)(4):¹

IT IS HEREBY STIPULATED AND AGREED, by and between the parties, and subject to the approval of the Court, that the following deadlines are amended as follows:

Event	Current Deadline	Revised Proposed Deadline
Close of fact discovery for Defendants ²	June 28, 2024	no change
Close of fact discovery for CosmoKey	June 28, 2024	August 23, 2024
Opening expert reports on issues to which a party bears the burden	July 26, 2024	September 20, 2024

¹ Pursuant to D. Del. LR 16.4, the undersigned counsel hereby certifies that this stipulation has been sent to counsel's respective clients.

² Between June 28, 2024 and August 23, 2024, Defendants (1) are not foreclosed from following up on issues Defendants have raised with respect to CosmoKey's infringement contentions, invalidity contentions, and June 28, 2024 discovery responses and (2) may complete the third-party discovery that was noticed and served (D.I. 201, 202). Defendants are further permitted to supplement their discovery responses and disclosures through August 23, 2024.

Event	Current Deadline	Revised Proposed Deadline
Rebuttal expert reports	August 30, 2024	October 18, 2024
Reply expert reports	September 27, 2024	November 15, 2024
Close of expert discovery	October 25, 2024	December 20, 2024
Deadline for case dispositive and <i>Daubert</i> motions	November 29, 2024	January 31, 2025
Case dispositive and <i>Daubert</i> opposition briefs	January 7, 2025	February 28, 2025
Case dispositive and <i>Daubert</i> reply briefs	January 21, 2025	March 14, 2025
Joint proposed pretrial order, as well as <i>in limine</i> motions, jury instructions, voir dire, and verdict form	April 30, 2025	April 30, 2025
Final pretrial/scheduling conference	May 21, 2025	May 21, 2025
5-day jury trial	June 9, 2025	June 9, 2025

POTTER ANDERSON & CORROON LLP

By: /s/ Bindu A. Palapura
 David E. Moore (#3983)
 Bindu A. Palapura (#5370)
 Andrew L. Brown (#6766)
 Hercules Plaza, 6th Floor
 1313 N. Market Street
 Wilmington, DE 19801
 Tel: (302) 984-6000
dmoore@potteranderson.com
bpalapura@potteranderson.com
abrown@potteranderson.com

Attorneys for Plaintiff CosmoKey Solutions GmbH & Co. KG

Dated: July 31, 2024
 11680785 / 19335.00001

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

By: /s/ Jennifer Ying
 Jack B. Blumenfeld (#1014)
 Jennifer Ying (#5550)
 Travis J. Murray (#6882)
 1201 North Market Street
 P.O. Box 1347
 Wilmington, DE 19899
 (302) 658-9200
jblumenfeld@morrisnichols.com
jying@morrisnichols.com
tmurray@morrisnichols.com

Attorneys for Defendants Duo Security LLC f/k/a Duo Security, Inc. and Cisco Systems, Inc.

IT IS SO ORDERED this ____ day of _____, 2024.

United States District Judge